

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

LISA LAPP, AS ADMINISTRATOR OF THE
ESTATE OF CHRISTOPHER LAPP AND
J.L., A MINOR, BY HER MOTHER AND
NEXT FRIEND, LISA LAPP,

Plaintiff,

v.

Case No. 1:23-cv-248-MSN-LRV

THE UNITED STATES OF AMERICA AND
DEAN INOUE,

Defendants.

OFFER OF JUDGMENT

Defendant Dean Inouye, by counsel, pursuant to Rule 68 of the Federal Rules of Civil Procedure, offers to allow judgment to be taken by Plaintiff against Dean Inouye in the total sum of \$1,750,000.00 (one million seven hundred and fifty thousand dollars and zero cents) for all costs and damages and fees, including but not limited to any attorneys fees sought in connection with this matter, including but not limited to compensatory damages, punitive damages, monetary sanctions, interest, litigation expenses and all other costs of suit incurred as of the date of this offer. This offer of judgment includes all attorney's fees and costs, and each party agrees to bear their own costs and attorney's fees. This means that any attorney's fees that would be recoverable by the Plaintiff under Title 42 Section 1983 or otherwise, are included within the sum offered and neither Plaintiff nor her attorneys shall be entitled to seek any additional sums in this case. The sum of total sum of \$1,750,000.00 (one million seven hundred and fifty thousand dollars and zero cents) is the total sum that shall be paid and no additional monies may be sought. Plaintiff shall be responsible for the satisfaction of any and all liens.

To accept this offer, Plaintiff must serve written notice of acceptance within fourteen (14) days from the date this offer is made. If Plaintiff does not accept this offer, she may become obligated to pay Defendant costs and fees, including attorney's fees incurred from the date of this offer. This offer of judgment shall not be construed as an admission of liability or that Plaintiff suffered any damages.

DEAN INOUE

By Counsel

/s/

Juliane C. Miller (VSB No. 34358)
Laura Lee Miller (VSB No. 89412)
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CERTIFICATE

I hereby certify that a true copy of the foregoing was sent via email this 16th day of January, 2023 to:
:

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